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Attorneys for Lynton L. Kotzin of Kotzin Valuation Partners,
Chapter 11 Liquidating Trustee/Plaintiff

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re:
MCCALLISTER PROPERTIES, LLC,
Debtor.

LYNTON L. KOTZIN OF KOTZIN
VALUATION PARTNERS, CHAPTER 11
LIQUIDATING TRUSTEE,

Movant/Judgment Creditor,

vs.

VIRTUAL OFFICE GLOBAL, LLC

Defendants/Judgment Debtors,

BANK OF ARIZONA

Garnishee.

(Chapter 11 Case)

No. 2:12-bk-01288-GBN

**CHAPTER 11 LIQUIDATING
TRUSTEE'S APPLICATION FOR WRIT
OF GARNISHMENT OF JUDGMENT
DEBTOR**

(NON-EARNINGS)

Movant, Lynton L. Kotzin of Kotzin Valuation Partners, Chapter 11 Liquidating Trustee
("Liquidating Trustee"), by and through attorneys undersigned, hereby applies, pursuant to A.R.S. §12-
1572, for a Writ of Garnishment of Virtual Office Global, LLC ("Judgment Debtor"). In support hereof,
Movant respectfully represents:

1. The Debtor in the above referenced bankruptcy case filed a Voluntary Petition under Chapter
11 of Title 11, United States Code, on January 24, 2012.

1 2. Chapter 11 Liquidating Trustee is the duly appointed and acting Trustee in this case and
2 Movant in this matter.

3 3. This Court entered a Judgment/ Order Directing Turnover in favor of Movant in the above-
4 captioned administrative proceeding on April 13, 2016 in the principal sum of \$952,528.00.

5 4. Despite demand by Movant, Judgment Debtor has failed and continues to fail to pay the
6 amount due under the Judgment/ Order Directing Turnover, or any portion thereof.

7 5. The total amount of \$952,528.00 remains due and owing to the Chapter 11 Liquidating Trustee
8 from the Judgment Debtor, plus interest which has been accruing interest at the rate set forth in 28 U.S.C.
9 §1961 per annum since.

10 6. Upon information and belief, Bank of America, N.A. ("**Garnishee**") is indebted to the
11 Judgment Debtor for (a) monies which are not earnings; or (b) the Garnishee is holding non-exempt
12 monies on behalf of the Judgment Debtor; or (c) the Garnishee has in its possession non-exempt
13 personal property belonging to the Judgment Debtor; or (d) the Garnishee is a corporation and the
14 Judgment Debtor are the owners of shares in such corporation, or has a proprietary interest in the
15 corporation.

16 7. The name and address of Garnishee is:

17
18 Bank of Arizona
19 3001 E. Camelback Rd., Ste. 100
20 Phoenix, Arizona 85018

21 WHEREFORE, Lynton L. Kotzin of Kotzin Valuation Partners, Chapter 11 Liquidating Trustee,
22 respectfully requests that this Court issue a Writ of Garnishment and Summons (Non-Earnings) of Virtual
23 Office Global, LLC, Judgment Debtor, as satisfaction of debt to the above referenced bankruptcy estate in
24 the amount of \$952,528.00 plus interest at the rate set forth in 28 U.S.C. §1961 per annum.

25 RESPECTFULLY SUBMITTED this 13th day of June, 2016.

26 **LANE & NACH, P.C.**

27 By: /s/ Adam B. Nach – 013622
28 Adam B. Nach
 Joel F. Newell
 Attorneys for Trustee

1 COPY of the foregoing delivered via electronic notification to:

2 Office of U.S. Trustee
230 North First Avenue
3 Phoenix, AZ 85003
4 Email: Patty.Chan@usdoj.gov

5 By /s/ Karen Graves